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REDACTED – FOR PUBLIC INSPECTION

October 28, 2013

VIA HAND DELIVERY AND ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *WC Docket No. 10-90*
The Micronesian Telecommunications Corporation dba IT&E
Form 481 Submission, SAC 653700
Request for Confidential Treatment

Dear Ms. Dortch:

On behalf of The Micronesian Telecommunications Corporation dba IT&E (“IT&E”), please find (1) IT&E’s Form 481 submission for SAC 653700 (Commonwealth of the Northern Mariana Islands or “CNMI”), which was timely filed with USAC on October 14, 2013 and (2) a request that this material be withheld from public inspection pursuant to sections 0.457 and 0.459 of the Commission’s rules. 47 C.F.R. §§ 0.457, 0.459. IT&E is filing concurrently a version of this submission redacted for public inspection through the Commission’s Electronic Comment Filing System. Per FCC Public Notice DA 13-2025, this filing is timely.

The submission contains commercial and technical data that IT&E does not in the normal course of its business reveal to the public or its competitors. IT&E thus requests that the submission be withheld from public inspection under Freedom of Information Act (“FOIA”) Exemption 4, 5 U.S.C. §552(b)(4), and Section 0.457(d)(2) of the Commission’s Rules.

In support of this request, IT&E provides the following information, as required by Sections 0.457(d)(2) and 0.459(b) of the Commission’s Rules.

1. Information for Which Confidentiality is Requested. IT&E is requesting confidential treatment for the non-redacted portions of the Form 481 submission, which contain commercially-sensitive, proprietary, and confidential operational, cost and technical

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- information about IT&E's past and anticipated investments in the very competitive telecommunications market in CNMI.
2. Circumstances Giving Rise to Submission of Materials. IT&E is submitting Form 481 and attachments to comply with newly adopted FCC rules.
 3. Degree to Which Information is Commercial or Financial, or Contains a Trade Secret or is Privileged. The attached document contains commercially-sensitive, proprietary, and confidential operational, financial and technical information about IT&E's infrastructure and plans in CNMI. IT&E closely guards this information against disclosure to competitors and the public. The information for which confidential treatment is sought concerns IT&E's private business and operations and "would customarily be guarded from competitors." *See* 47 C.F.R. §§ 0.459(a)(4), 0.457(d)(2). Such proprietary and confidential information may be withheld from public disclosure under FOIA Exemption 4.
 4. Degree to Which Information Concerns a Service That is Subject to Competition. The submission contains commercially-sensitive, proprietary, and confidential operational and financial information about IT&E's past investments and future infrastructure plans in the CNMI telecommunications market, which is highly competitive.
 5. Substantial Competitive Harm That Would Result from Disclosure of Information. Public disclosure of the commercially-sensitive, proprietary, and confidential operational and financial information set forth in the Plan would cause competitive harm to IT&E. The telecommunications industry in CNMI is highly competitive, and thus others always are interested in gaining a competitive advantage by learning information about IT&E's infrastructure plans and construction schedules. The D.C. Circuit has found that parties do not have to "show actual competitive harm" to justify confidential treatment. Rather, "[a]ctual competition and the likelihood of substantial competitive injury" is sufficient to bring commercial information within the realm of confidentiality." *Public Citizen Health Research Group*, 704 F.2d at 1291, *quoting Gulf & Western Industries v. U.S.*, 615 F.2d 527, 530 (D.C. Cir. 1979).
 6. Measures Taken to Prevent Unauthorized Disclosure. IT&E treats the operational and financial information set forth in the submission as confidential and proprietary and does not publicly disclose this information.
 7. Previous Disclosure. There has been no public disclosure of the information that IT&E has redacted in its public filing.
 8. Requested Duration of Nondisclosure. The attached Request should not be released for public inspection until such information no longer is deemed confidential and proprietary by IT&E and no longer subject to IT&E's internal procedures for maintaining its confidentiality. The attached Request contains commercially-

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REDACTED – FOR PUBLIC INSPECTION

sensitive, proprietary and confidential operational and technical information, the release of which would adversely affect IT&E's competitive position.

For the foregoing reasons, IT&E respectfully requests that the Commission withhold from public inspection the attached document. Consistent with 47 C.F.R. § 0.459(d)(1), IT&E requests notification if access to the attachment is requested pursuant to the FOIA or otherwise, so that IT&E may have an opportunity to oppose the grant of any such request. As noted previously, a redacted version of the document is being filed with ECFS.

If you have any questions, please contact the undersigned.

Respectfully submitted,

/s/ Timothy J. Cooney
Timothy J. Cooney

**FCC Form 481 - Carrier Annual Reporting
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010> Study Area Code	653700
<015> Study Area Name	MICRONESIAN TELECOMM
<020> Program Year	2014
<030> Contact Name: Person USAC should contact with questions about this data	Leriza S. Debrum
<035> Contact Telephone Number: Number of the person identified in data line <030>	(670-682-2612)
<039> Contact Email Address: Email of the person identified in data line <030>	leriza.debrum@itehq.net

ANNUAL REPORTING FOR ALL CARRIERS			54.313 Completion Required	54.422 Completion Required
(check box when complete)				
<100> Service Quality Improvement Reporting	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
<200> Outage Reporting (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<210> <input checked="" type="checkbox"/> <-- check box if no outages to report				
<300> Unfulfilled Service Requests (voice)	<input type="text" value="0"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
<310> Detail on Attempts (voice)	(attach descriptive document)	<input type="checkbox"/>	<input type="checkbox"/>	
<320> Unfulfilled Service Requests (broadband)		<input type="checkbox"/>	<input type="checkbox"/>	
<330> Detail on Attempts (broadband)	(attach descriptive document)	<input type="checkbox"/>	<input type="checkbox"/>	
<400> Number of Complaints per 1,000 customers (voice)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<410> Fixed	<input type="text" value="0.0"/>			
<420> Mobile				
<430> Number of Complaints per 1,000 customers (broadband)		<input type="checkbox"/>	<input type="checkbox"/>	
<440> Fixed				
<450> Mobile				
<500> Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	<input type="checkbox"/>	<input type="checkbox"/>	
<510> <input type="text"/>	(attached descriptive document)	<input type="checkbox"/>	<input type="checkbox"/>	
<600> Functionality in Emergency Situations	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<610> <input type="text" value="653700MP610"/>	(attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<700> Company Price Offerings (voice)	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>	
<710> Company Price Offerings (broadband)	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>	
<800> Operating Companies and Affiliates	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<900> Tribal Land Offerings (Y/N)? <input type="radio"/> <input checked="" type="radio"/>	(if yes, complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>	
<1000> Voice Services Rate Comparability	(check to indicate certification)	<input type="checkbox"/>	<input type="checkbox"/>	
<1010> <input type="text"/>	(attach descriptive document)	<input type="checkbox"/>	<input type="checkbox"/>	
<1100> Terrestrial Backhaul (Y/N)? <input checked="" type="radio"/> <input type="radio"/>	(if not, check to indicate certification)	<input type="checkbox"/>	<input type="checkbox"/>	
<1110> <input type="text"/>	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>	
<1200> Terms and Condition for Lifeline Customers	(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<2000>	(check to indicate certification)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<2005>	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>

Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet

<3000>	(check to indicate certification)	<input type="checkbox"/>	<input type="checkbox"/>
<3005>	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>

(100) Service Quality Improvement Reporting Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	653700
<015> Study Area Name	MICRONESIAN TELECOMM
<020> Program Year	2014
<030> Contact Name - Person USAC should contact regarding this data	Leriza S. Debrum
<035> Contact Telephone Number - Number of person identified in data line <030>	(670-682-2612)
<039> Contact Email Address - Email Address of person identified in data line <030>	leriza.debrum@itechq.net

<110> Has your company received its ETC certification from the FCC?	(yes / no)	<input checked="" type="radio"/> <input type="radio"/>
If your answer to Line <110> is yes, do you have an existing §54.202(a) "5		
<111> year plan" filed with the FCC?	(yes / no)	<input checked="" type="radio"/> <input type="radio"/>

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

653700MP100

Name of Attached Document (.pdf)

Please check these boxes below to confirm that the attached PDF, on line 112, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

<113> Maps detailing progress towards meeting plan targets
<114> Report how much universal service (USF) support was received
<115> How (USF) was used to improve service quality
<116> How (USF) was used to improve service coverage
<117> How (USF) was used to improve service capacity
<118> Provide an explanation of network improvement targets not met in the prior calendar year.

<input checked="" type="checkbox"/>	
<input checked="" type="checkbox"/>	
<input checked="" type="checkbox"/>	
<input checked="" type="checkbox"/>	
<input checked="" type="checkbox"/>	
<input checked="" type="checkbox"/>	

(200) Service Outage Reporting (Voice)
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	653700
<015>	Study Area Name	MICRONESIAN TELECOMM
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Leriza S. Debrum
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<039>	Contact Email Address - Email Address of person identified in data line <030>	leriza.debrum@itehq.net

[illegible]

**(700) Price Offerings including Voice Rate Data
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	653700
<015>	Study Area Name	MICRONESIAN TELECOMM
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Leriza S. Debrum
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<039>	Contact Email Address - Email Address of person identified in data line <030>	leriza.debrum@itehq.net

<701>	Residential Local Service Charge Effective Date	1/1/2013
<702>	Single State-wide Residential Local Service Charge	

[illegible]

(800) Operating Companies Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	653700
<015>	Study Area Name	MICRONESIAN TELECOMM
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Leriza S. Debrum
<035>	Contact Telephone Number - Number of person identified in data line <030>	(670-682-2612)
<039>	Contact Email Address - Email Address of person identified in data line <030>	leriza.debrum@itehq.net
<810>	Reporting Carrier	Micronesian Telecommunications Corp.
<811>	Holding Company	Pacific Telecom Inc.
<812>	Operating Company	Micronesian Telecommunications Corp.

<813>	<a1>	<a2>	<a3>
	Affiliates	SAC	Doing Business As Company or Brand Designation

-- See attached worksheet --

(900) Tribal Lands Reporting Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	653700
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<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Leriza S. Debrum
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<039>	Contact Email Address - Email Address of person identified in data line <030>	leriza.debrum@itehq.net

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

Name of Attached Document (.pdf)

If your company serves Tribal lands, please select (Yes,No, NA) for each these boxes to confirm the status described on the attached PDF, on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions;
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select (Yes,No, NA)

**(1100) No Terrestrial Backhaul Reporting
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	653700
<015>	Study Area Name	MICRONESIAN TELECOMM
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Leriza S. Debrum
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<039>	Contact Email Address - Email Address of person identified in data line <030>	leriza.debrum@itechq.net

<1120> Please check this box to confirm no terrestrial backhaul options exist within the supported area pursuant to § 54.313(G) ☐

<1130> Please check this box to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(G) ☒

(1200) Terms and Condition for Lifeline Customers Lifeline Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	653700
<015>	Study Area Name	MICRONESIAN TELECOMM
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Leriza S. Debrum
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<039>	Contact Email Address - Email Address of person identified in data line <030>	leriza.debrum@itehq.net

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of attached document (.pdf)

<1220> Link to Public Website

HTTP http://www.pticom.com/lifeline_and_link-up_programs.cfm

"Please check these boxes below to confirm that the attached PDF, on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

<1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, ☒

<1222> Details on the number of minutes provided as part of the plan, ☒

<1223> Additional charges for toll calls, and rates for each such plan. ☒

(2000) Price Cap Carrier Additional Documentation

Data Collection Form

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	653700
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<039>	Contact Email Address - Email Address of person identified in data line <030>	leriza.debrum@itehq.net

CHECK the boxes below to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e) the information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

- <2010> 2nd Year Certification {47 CFR § 54.313(b)(1)}
- <2011> 3rd Year Certification {47 CFR § 54.313(b)(2)}

☐
☐

Price Cap Carrier Receiving Frozen Support Certification {47 CFR § 54.312(a)}

- <2012> 2013 Frozen Support Certification
- <2013> 2014 Frozen Support Certification
- <2014> 2015 Frozen Support Certification
- <2015> 2016 and future Frozen Support Certification

☒
☐
☐
☐

Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}

- <2016> Certification Support Used to Build Broadband

☐

Connect America Phase II Reporting {47 CFR § 54.313(e)}

- <2017> 3rd year Broadband Service Certification
- <2018> 5th year Broadband Service Certification
- <2019> Interim Progress Certification
- <2020> Please check the box to confirm that the attached PDF , on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.
- <2021> Interim Progress Community Anchor Institutions

☐
☐
☐
☐

Name of Attached Document Listing Required Information

(3000) Rate Of Return Carrier Additional Documentation		FCC Form 481
Data Collection Form		OMB Control No. 3060-0986/OMB Control No. 3060-0819
		July 2013

<010>	Study Area Code	653700
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<035>	Contact Telephone Number - Number of person identified in data line <030>	(670-682-2612)
<039>	Contact Email Address - Email Address of person identified in data line <030>	leriza.debrum@itehq.net

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

Progress Report on 5 Year Plan

(3010)	Milestone Certification {47 CFR § 54.313(f)(1)(i)} Please check this box to confirm that the attached PDF, on line 3012, contains the required information pursuant to § 54.313 (f)(1)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.	Name of Attached Document Listing Required Information	<input type="checkbox"/>
(3012)	Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)}	Name of Attached Document Listing Required Information	<input type="checkbox"/>
(3013)	Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)}		<input type="checkbox"/> (Yes/No)
(3014)	If yes, does your company file the RUS annual report Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:		<input type="checkbox"/> (Yes/No)
(3015)	Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)		<input type="checkbox"/>
(3016)	PDF of Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	Name of Attached Document Listing Required Information	<input type="checkbox"/>
(3018)	If the response is no on line 3014, Is your company audited? If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains :		<input type="checkbox"/> (Yes/No)
(3019)	Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications		<input type="checkbox"/>
(3020)	PDF of Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(3021)	Management letter issued by the independent certified public accountant that performed the company's financial audit. If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:		<input type="checkbox"/>
(3022)	Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers,		<input type="checkbox"/>
(3023)	Underlying information subjected to a review by an independent certified public accountant		<input type="checkbox"/>
(3024)	Underlying information subjected to an officer certification.		<input type="checkbox"/>
(3025)	PDF of Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(3026)	Attach the worksheet listing required information	Name of Attached Document Listing Required Information	<input type="checkbox"/>

Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<039>	Contact Email Address - Email Address of person identified in data line <030>	leriza.debrum@itechq.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	MICRONESIAN TELECOMM
Signature of Authorized Officer:	CERTIFIED ONLINE
Date	10/15/2013
Printed name of Authorized Officer:	Rose Soledad
Title or position of Authorized Officer:	Managing Director
Telephone number of Authorized Officer:	670-682-2609
Study Area Code of Reporting Carrier:	653700
Filing Due Date for this form:	10/15/2013
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Certification - Agent / Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	653700
<015> Study Area Name	MICRONESIAN TELECOMM
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<039> Contact Email Address - Email Address of person identified in data line <030>	leriza.debrum@itechq.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date:
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	
Name of Authorized Agent or Employee of Agent:	
Signature of Authorized Agent or Employee of Agent:	Date:
Printed name of Authorized Agent or Employee of Agent:	
Title or position of Authorized Agent or Employee of Agent:	
Telephone number of Authorized Agent or Employee of Agent:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Attachments

<010>	Study Area Code	653700
<015>	Study Area Name	MICRONESIAN TELECOMM
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<039>	Contact Email Address - Email Address of person identified in data line <030>	leriza.debrum@itechq.net
<810>	Reporting Carrier	Micronesian Telecommunications Corp.
<811>	Holding Company	Pacific Telecom Inc.
<812>	Operating Company	Micronesian Telecommunications Corp.

10/15/2013



October 15, 2013

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

USAC
Vice President, High Cost and Low Income Division
2000 L Street NW, Suite 200
Washington, DC 20036

Re: The Micronesian Telecommunications Corporation d/b/a IT&E Certification Pursuant to 47 C.F.R. § 54.313(a) (6) and set forth in 47 C.F.R. § 54.202(a)(2).

Pursuant to the requirements of 47 C.F.R. § 54.313(a)(6) and set forth in 47 C.F.R. § 54.202(a)(2) *The Micronesian Telecommunications Corporation* hereby certifies to the Federal Communications Commission and the Universal Service Administrative Company that it is able to function in emergency situations as described in the attached Business Continuity Plan.

I, Steven Carrara, attest for the Study Area Code 653700.

A handwritten signature in black ink, appearing to read 'ST Carrara', is written over a horizontal line.

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cc: CNMI PUC

NETWORK RESTORATION CONTINGENCY PLAN
FOR
IT&E GUAM & CNMI TERRESTRIAL AND UNDERSEA CABLE
AND INTER-ISLAND MICROWAVE PLANT

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EXECUTIVE SUMMARY

This document describes IT&E's cable plant and interisland microwave networks with concentration on the prioritization of restoration of failed or damaged cables due to: (1) natural disasters such as earthquakes; (2) contractor activity that damages buried cables; (3) cases where by coincidence, multiple cables fail at the same time and crews are not available to work on all failed cables simultaneously; and (4) failures of the interisland microwave network due to natural disasters such as typhoons. The estimated revenue losses due to cable and microwave network disruptions are detailed so that judicious decisions can be made on scheduling restoration activities and assigning work crews so as to minimize loss of revenue.

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I INTRODUCTION

IT&E owns buried copper and terrestrial fiber optic cable in the CNMI, buried fiber optic cable in Guam, undersea fiber optic cable interconnecting the four islands of Guam, Rota, Tinian, and Saipan, and a microwave backbone network also interconnecting the four islands which serves primarily as a backup redundant alternate route for inter-island and international traffic in case of damage to the undersea fiber optic cable.

This cable/microwave plant supports cellular, pots, DSL, IPL, and local private line connectivity. Each of these services generates revenue for the company, and since they ride on the same cables, damage to the cable plant affects customers of all four services and can result in significant loss of revenue to the company until damage is repaired and service is restored.

This document assesses the potential loss of revenue due to damage to elements of this plant and assigns priorities to restoration efforts that minimize the potential loss in revenue.

This document begins by describing the elements that form this cable plant, the physical configuration of the plant by means of tables and maps, the estimated subscriber population densities by means of tables and maps generated by the US Census Bureau, the vulnerabilities of the elements of the cable plant to damage, mitigation of those vulnerabilities, and a brief description of the criteria used to determine the priorities for restoration efforts in case of damage.

The final four sections of this document delineates service-by-service the priorities that should be assigned to restoration efforts in case of failures or damages to the cable plant by earthquakes or contractor-related activities on a cable-by-cable basis to maximize the number of subscribers to which service is restored while minimizing the time service is down according to weighted metrics determined by factors such as equipment availability, manpower required, loss of revenue, restoration costs, and other business and humanitarian considerations, etc. It also does likewise for the inter-island microwave backbone network.

The document can also be used for other purposes, for example, providing guidance in determining what cable plant elements IT&E should consider for insuring against earthquake and contractor-activity related damage and determining how to structure loss-of-revenue insurance.

II. NETWORK ELEMENTS

(d) III. NETWORK CONFIGURATION

IV. SUBSCRIBER POPULATION DENSITIES

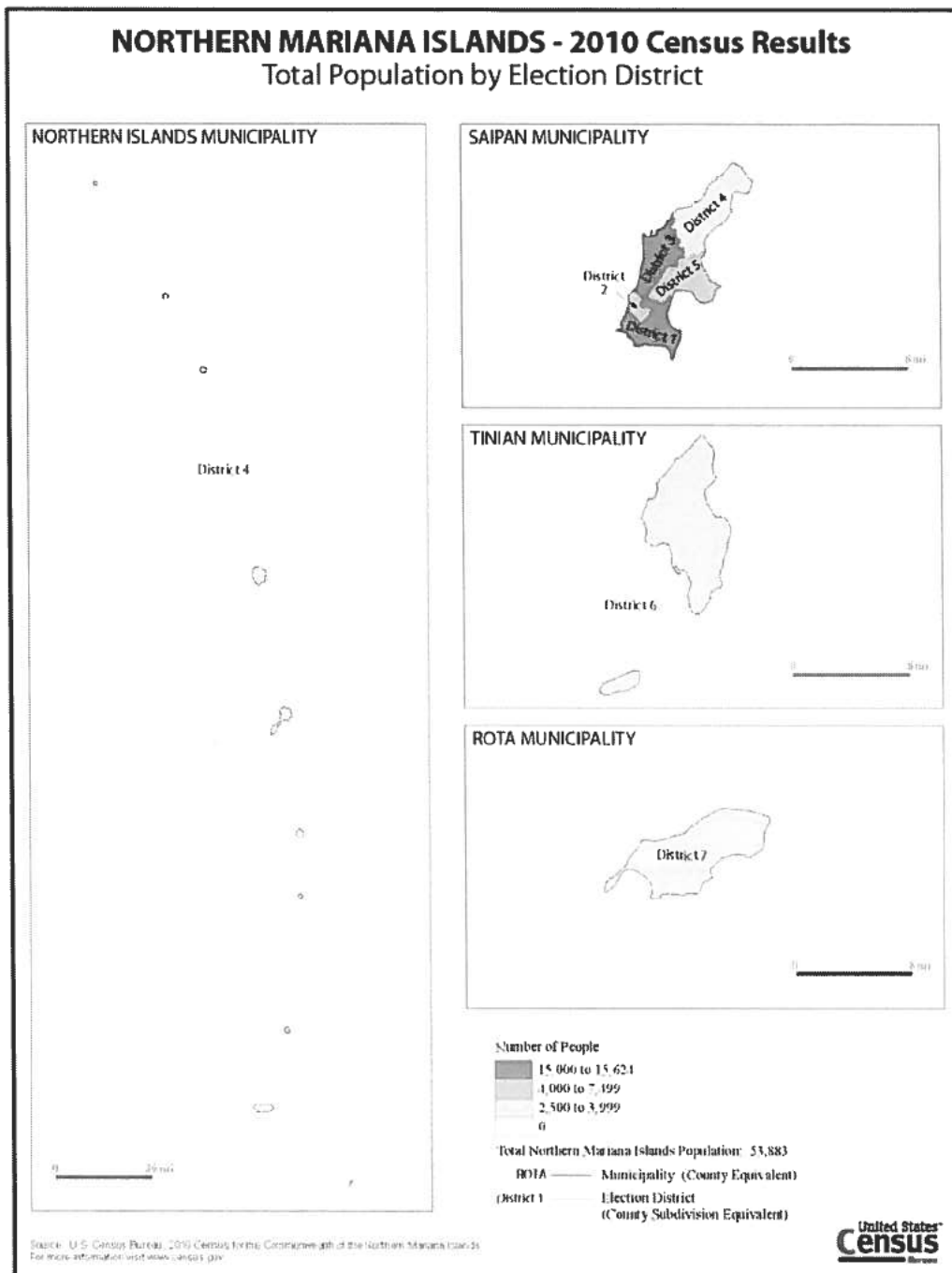


Figure 10. CNMI Populations by District

V. VULNERABILITIES

VI. MITIGATION OF VULNERABILITIES

VII. Restoration Criteria

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IT&E (CNMI) WIRE LINE

FIVE YEAR SERVICE QUALITY IMPROVEMENT PLAN

OVERVIEW

The Micronesian Telecommunications Corporation dba IT&E, ("IT&E"), as an Eligible Telecommunications Carrier (ETC) and incumbent local exchange carrier, currently provides Universal Service supported wire line services to 12 exchanges, for which there are 8 wire centers.

Consistent with Commission requirements, this Service Quality Improvement Plan addresses only IT&E's regulated eligible telecommunications carrier operations.¹ A detailed description of IT&E's plans for the provision of the supported services in the five-year period starting with January 2013 is provided herein. IT&E will re-evaluate this plan on an annual basis. The environment in which IT&E operates remains dynamic. As a result, IT&E reserves the opportunity to modify its plan in response to further regulatory decisions as they are adopted, and as IT&E's financial viability in providing the required services and service level quality becomes known.

Per USAC data, during the calendar year 2012, IT&E has received a total of \$663,123 (as of 1/31/2013) in USF support funds. The breakdown of the funding for the year was:

- \$0 High Cost Loop Support,
- (\$19,644) Local Switching Support
- \$0 Connect America Fund-Intercarrier Compensation Support
- (\$597) Interstate Common Line Support
- \$683,364 Frozen High Cost Support

All funds were used in 2012 to maintain, upgrade and improve IT&E's network and to cover its operating expenses and debt commitments as necessary to permit it to offer a high level of service for both voice and broadband throughout its service area. IT&E spent a total of _____ to maintain and improve the quality of wire line voice and data service in calendar year 2012.

IMPROVEMENT PLANS BY YEAR (2013-2017 inclusive)

Summary descriptions in accordance Part 54.202(a)(1)(ii) and Part 54.313(a)(1) by year and by wire center are presented in the paragraphs below and present network improvements planned for the next five years. Detailed expenditures on a wire center basis are contained in the attached Excel worksheets. Area and population estimates impacted by the improvements are identified in the worksheets as well as on the wire center maps. Costs are broken out by site and service.

¹Per 47 C.F.R. § 54.314, federal USF support, "will be used only for the provision, maintenance, and upgrading of facilities and services for which the support is intended." If investments or expenses are for service areas larger than the supported service areas, then allocations of the expenditures are required.

- Network improvement expenditures identify the cost to provide those services supported by the universal service funding mechanisms. When a project involves expenditures for both regulated and non-regulated services, the non-regulated investment costs have been removed. IT&E estimates non-regulated costs using the appropriate allocation rules. Details of those costs are retained by IT&E and available for inspection.
- Costs for individual projects involving multiple wire centers are broken out by wire center on a ratio of “population served” basis if a specific dollar amount is unavailable.
- Costs are reported only for those service areas in which IT&E is authorized to receive USF funding. Costs incurred outside the authorized area, if any, are excluded.

BASELINE MAPS

IT&E presents the attached Baseline Maps (GIS or similar) highlighting current availability of broadband service, by wire center, which delivers at least 4 Mbs actual downstream and 1Mbps actual upstream within its territory which is sufficient to provide VoIP. This is the baseline territory for the network performance testing that will be required in the future.

IT&E is an incumbent local exchange carrier (ILEC) providing telecommunications to the islands of Rota, Tinian, and Saipan in the Commonwealth of the Northern Mariana Islands (CNMI). Established in 1981, it serves a current population of 53,883, over a geographic area of 154.6 sq miles. The service territory is generally hilly with few streams and a limited number of road crossings. The population is concentrated in small villages scattered around the islands. The community is incorporated as a commonwealth. There are a many small family businesses; health, medical, and police facilities are located throughout the community on all three islands. There is a government fire department and both a public school system and many private schools. There are many other anchor institutions located within the serving area. A complete listing can be found on the NTIA ARRA BTOP website.

The demographics of the community reflect its multicultural local and immigrant ethnic roots. The indigenous ethnic population is Chamorro with a sizeable community of Carolinians. There are small, but reasonably sized, ethnic Korean and Chinese communities along with a sizeable Filipino population, all of which use their native languages. IT&E’s staff provides customer service in Tagalog, Chinese and Korean languages as needed. Religious affiliations include Roman Catholics, various protestant Christian sects, Muslims, and Buddhists.

There are 20,850 households and a total population of 53,883 within the service territory. The median household income level is approximately \$27,500.00. As a result of the low income, IT&E serves 2,044 Lifeline subscribers.

